

ORIGINAL

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)
)
Advanced Television Systems)
and Their Impact Upon the Existing)
Television Broadcast Service)

MM Docket No. 87-268

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

JOINT RESPONSE OF
AMERICA'S PUBLIC TELEVISION STATIONS AND
PUBLIC BROADCASTING SERVICE
ON
EX PARTE SUBMISSIONS OF MSTV AND ALTV ADDRESSING
DIGITAL TV ALLOTMENTS

America's Public Television Stations (APTS) and the Public
Broadcasting Service (PBS) (collectively "APTS/PBS") commend the
Association of Maximum Service Broadcasters (MSTV) and the Association
of Local Television Stations, Inc. (ALTV) for their proposals to correct specific
problems with the table of DTV allotments/assignments contained in
Appendix B of the Sixth Report and Order in this proceeding ("DTV Table").¹

APTS/PBS agree with and endorse MSTV's statement of technical
problems with the DTV Table and urge the Commission to modify the Table
to address these problems. While the Table proposed by MSTV in Exhibit 1A
of their *ex parte* filing ("MSTV Table") reduces interference to NTSC and

¹ Sixth Report and Order in MM Docket No. 87-268, adopted April 3, 1997, FCC 97-115
(released April 21, 1997) ("Sixth R&O").

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DTV service for numerous public television stations, it creates technical and economic problems for other stations. Accordingly, we cannot endorse the MSTV Table as proposed and urge the Commission to adopt an altered Table that resolves public television's concerns.

APTS/PBS likewise share concerns about the power differential that exists between VHF NTSC stations allotted UHF DTV channels (V-to-U stations) and UHF NTSC stations allotted UHF DTV channels (U-to-U stations), as articulated by ALTV. We believe, however, that the solution proposed by ALTV would be very difficult to implement from a technical perspective, and therefore we are unable to endorse it. We urge the Commission to recognize the potential problems associated with the power differential by establishing a special window during which only UHF licensees assigned UHF DTV channels can request permission to use higher power levels and directional antennas.

I. MSTV EX PARTE SUBMISSION

A. MSTV Correctly Identifies Technical Problems with the DTV Table

MSTV has identified two systematic problems with the DTV Table. First, in its Petition for Clarification and Partial Reconsideration, MSTV contended that three congested areas of the country -- the Northeast Corridor, the Great Lakes Region and the California coastal region ("Acute Problem Areas") will be plagued by increased interference to NTSC service and

decreased replication.² APTS/PBS concurred in this technical analysis. In a separate petition, APTS/PBS encouraged the Commission, as it addresses these problems, to make every effort to provide public television licensees with assignments within the Commission's guaranteed core—7 and 46.³

Second, MSTV has notified the Commission of a newly identified problem related to DTV-to-DTV adjacent channels. Recent testing, conducted by the Advanced Television Technology Center ("ATTC"), shows that the DTV Table severely underestimates the extent to which DTV signals are susceptible to interference. According to MSTV's analysis, approximately 250 DTV-to-DTV adjacent channel assignments are too close to each other and create interference problems.⁴ APTS/PBS agree with and support the technical analysis presented by MSTV on the DTV-to-DTV adjacent channel interference problem. The DTV assignments of 39 public television stations are subject to interference due to the proximity of adjacent DTV channels.

APTS/PBS urge the Commission to address both of these technical problems with the DTV Table in its reconsideration order. The Table

² Petition for Clarification and Partial Reconsideration of the Fifth and Sixth Reports and Orders submitted by The Association for Maximum Service Television, Inc., The Broadcasters Caucus and Other Broadcasters, MM Docket No. 87-268 (June 13, 1997) (MSTV Petition), pp. 7-8. APTS/PBS were signatories on this petition.

³ Petition for Partial Reconsideration and Clarification submitted by America's Public Television Stations and Public Broadcasting Service, MM Docket No. 87-268 (June 13, 1997) (APTS/PBS Petition), at 10.

⁴ Comment On and Opposition to Petitions for Reconsideration of the Fifth and Sixth Reports and Orders Submitted by the Association for Maximum Service Television, Inc. and the Broadcasters Caucus, MM Docket No. 87-268 (July 18, 1997); Reply to Oppositions to Supplemental Engineering Information Filed in Support of Petitions for Reconsideration Submitted by the Association for Maximum Service Television, Inc., MM Docket No. 87-268 (October 8, 1997).

proposed by MSTV and Other Broadcasters goes a long way toward reducing interference to NTSC and DTV service for some stations particularly in the Acute Problem Areas, and toward curing the short-spacing of the DTV-to-DTV adjacent channels. While the proposed MSTV Table, on balance, benefits public television stations⁵, it also creates additional problems—both technical and financial—for other public television stations. Accordingly, APTS/PBS cannot support the MSTV Table as submitted.

B. The Table Proposed by MSTV Creates Additional Problems for Certain Public Television Licensees

1. The MSTV Table Assigns Additional Out-of Core DTV Channels to Public Television Stations

In our Petition for Reconsideration, APTS/PBS explained why the placement of public television stations outside the “core” group of channels will impose significant additional burdens on these stations. Public television’s non-profit status and unique funding structure, including its reliance on federal and state funding, community campaign drives and corporate contributions, will strain public television’s ability to fund a single set of digital facilities. Raising contributions to fund the construction of a

⁵ The table proposed by MSTV would increase: public television’s overall replication of its NTSC service area from 97.5% (in the FCC Table) to 98.4%; the number of public television stations with 100% replication from 91 (in the FCC Table) to 96; and the number of public television stations with 99% replication from 124 (in the FCC Table) to 132.

While the proposed MSTV Table decreases the number of public television stations with no new interference from DTV assignments to their current NTSC service area (DTV-to-NTSC interference) from 137 to 136, it does make a modest reduction in the amount of DTV-to-NTSC interference for public television stations overall. The average DTV-to-NTSC interference for public television stations drops from 1.7% in the FCC Table to 1.5% in the MSTV Table.

second set of digital facilities within a ten-year period will be extremely difficult for all stations and likely to be insurmountable for some. Recent data submitted to the Office of Management and Budget in support of public television's request for federal funding shows that the average cost of the transition to digital for public television stations is \$4.7 million (including dual operating costs) and \$3.8 million (excluding the operating costs). Almost half of the public television licensees (86 out of 177) will incur transition costs that alone exceed their projected annual revenues. This shortfall ranges from \$116 to \$118 million.

APTS/PBS requested special relief for public television stations assigned digital channels outside the core. Among other things, APTS/PBS requested the Commission, to the extent that it modified the DTV Table, to locate digital channels for public television stations inside the core of cores—Channels 7-46. Yet, in order to alleviate congestion in the "Acute Problem Areas" and to spread out the DTV-to-DTV adjacent channel assignments, the MSTV Table assigned additional non-core DTV channels to public stations. The MSTV table:

- increased the number of public stations with both their analog and DTV channels above 51 (non-core channels under either core option: 2-46 or 7-51) from 3 to 11, and
- increased the number of public television DTV channels assigned to Channels 60 to 69 from 2 to 9.⁶

⁶ Attachment A lists (1) public television stations with analog channels above 51 that received DTV channel assignments above channel 51, under the proposed MSTV Table and (2) public television stations that received DTV channel assignments between Channel 60-69 under the proposed MSTV table.

While we recognize the need to expand the number of non-core assignments and assignments above channel 59 to alleviate the technical problems in the DTV Table, we believe that it should be done in a manner that favors in-core channel assignments for public television. This approach would prevent stations, which are already financially vulnerable, from facing the Herculean task of securing financing to construct DTV facilities twice in ten years. It would also assure that valuable public television service is not lost to a community simply because it cannot financially support the construction of dual facilities.

2. The MSTV Table Would Create Additional Technical Problems for Certain Public Television Stations

While it improves replication and lessens interference for many public television stations, the proposed MSTV Table creates new technical and financial problems for other public television stations. The following exemplify some of the problems created by the proposed MSTV Table for public television stations⁷:

- WNYE, which is licensed to the Board of Education of the City of New York and provides instructional programming to New York City schools, would be switched from FCC Channel 24, with 98.5% replication of its current coverage area, to MSTV Channel 26, with only 74.9% of its current coverage area.⁸

⁷ These comments are not intended to advise the Commission of all public television stations' concerns regarding the MSTV Table. Certain public stations, including some identified herein, are expected to file separately.

⁸ To increase replication to an acceptable level on the proposed MSTV Channel 26 would require WNYE to increase power and co-locate on the World Trade Center. Such modifications would be too costly for the station to afford from its operating budget of only \$1.6 million without some special sources of funding.

- WITF, Harrisburg, PA would be switched from FCC Channel 36 to MSTV Channel 4, leaving WITF as the only VHF assignment in an otherwise all UHF market. This would require viewers to install a second VHF antenna just to receive WITF, placing the station in jeopardy of losing viewership, underwriting and public support.⁹
- The switches proposed by MSTV for WNPE, Watertown, NY and WNPI, Norwood, NY, two small stations in rural markets with a joint annual operating budget of less than \$3 million, would require a new tower and separate transmission lines in contrast to the FCC assignments, which allow for a shared tower and transmission line.
- While the channel changes proposed by MSTV for WMVT and WMVS, licensed to the Milwaukee Area Technical College District in Milwaukee, would improve coverage for WMVT (see *MSTV Ex Parte* Submission at 7), they would prevent the licensee from saving money by putting its adjacent analog and digital channels on a single transmitter and controlling its own adjacent interference.¹⁰

Additional problems caused by the proposed MSTV Table, of which APTS/PBS are currently aware, are discussed in Attachment B.

* * * *

APTS/PBS concur in MSTV's assessment that the systemic problems identified in the DTV Table must be addressed to produce a table that more fully meets our joint goals of replication, minimum interference and potential maximization. We urge the Commission to address the coverage and interference problems that currently plague the DTV Table in its

⁹ A DTV equipment vendor has proposed to make WITF the beta test site for a mid-powered UHF signal (channel 36) for the state of Pennsylvania, which would allow WITF to become a DTV pioneer and early service provider. A Channel 4 DTV assignment would eliminate that opportunity.

¹⁰ The licensee of WMVS/WMVT, with adjacent FCC channels for both stations (24/25 & 35/36), currently plans to use emerging channel transmitter technology that would combine its NTSC 36 and DTV 35 on a single transmitter. The MSTV assignment of digital Channel 61 would nullify those cost-savings and force a costly double move on WMVT.

reconsideration order. If the FCC uses the proposed MSTV Table as the basis for resolving these problems, APTS/PBS request the FCC to ensure that public television stations are not further disadvantaged by the assignment of additional out-of-core assignments or the creation of additional technical or financial problems.

II. ALTV *EX PARTE* SUBMISSION

APTS/PBS applaud ALTV for its attempts to fashion a proposal to address the disparity in authorized power between VHF NTSC stations allotted UHF DTV channels (V-to-U stations) and UHF NTSC stations allotted UHF DTV channels (U-to-U stations). Most public television licensees currently operate on UHF channels and many have been assigned UHF DTV allotments with significantly less radiated power. APTS/PBS share the concerns articulated by ALTV, Viacom and other UHF operators that the power differential between the V-to-U and U-to-U stations will widen the current disparity between VHF and UHF operators, and will adversely affect the ability of lower powered U-to-U stations to adequately serve their communities in the same way as corresponding one megawatt stations in their markets.¹¹

¹¹ See Opposition to the Petitions for Reconsideration in the Fifth Report and Order and Sixth Report and Order of the Association of America's Public Television Stations and the Public Broadcasting Service, MM Docket No. 87-268 (July 18, 1997); Reply Comments of the Association of America's Public Television Stations and the Public Broadcasting Service, MM Docket No. 87-268 (July 31, 1997); Opposition to Petitions for Reconsideration of the Fifth Report and Order and of the Sixth Report and Order filed by Viacom Inc. (July 18, 1997) ("Viacom Opposition"); Consolidated Oppositions to and Comments on Petitions for Reconsideration filed by Sinclair Broadcasting Group, Inc. (July 18, 1997); Opposition to

APTS/PBS, however, cannot support the ALTV proposed solution. While the goal of the proposal is laudable, the suggested implementation scheme is flawed. The ALTV proposal would permit all DTV stations to operate at a maximum of one megawatt of power, provided that beam tilt antennas and/or other technologies are used to prevent "incremental visible interference" both inside and outside their protected contours in excess of that allowed under the FCC's DTV Table. Adoption of this one megawatt presumption would, in effect, shift the burden of proving no "incremental visible interference" from the station operating at a higher power to a neighboring station that may be subject to increased interference. The ALTV proposal would require the aggrieved station to demonstrate, with actual field strength measurements taken by a registered professional engineering firm, that any visible interference exceeds the level of interference that would have existed under the assigned FCC power levels.

APTS/PBS believe this will impose an unfair and unworkable burden on the aggrieved station. Current testing methodologies will not permit accurate or consistent measurements of visible interference, particularly at the fringes of a station's protected contour. Because of atmospheric changes and other variables, actual field measurements can vary such that it would be virtually impossible for an aggrieved station to obtain consistent and reliable

proof of interference. Consequently, the proposed enforcement procedure simply cannot be implemented in a practical or workable manner.

In addition, the proposal would place an unfair financial burden on the aggrieved station. To protect itself from unwanted interference, the aggrieved station would be required to pay for actual field tests conducted by engineering consultants. Such tests are very expensive, particularly if they must be repeated to attempt to obtain usable results.¹² Given the inherent unreliability of such tests, an aggrieved station would bear the financial burden of conducting expensive testing that may ultimately be inconclusive and fail to protect the station from interference.

While some public stations may be in a position to take advantage of the one megawatt presumption, our stations may find themselves defending against interference from other stations. Public television stations simply cannot afford the diminution of service that would occur with increased interference. It would deprive the viewing public of important educational services, and it would negatively impact stations that are heavily dependent on contributions from their viewers. Nor can public stations afford to divert scarce resources needed for programming and operations to protect their service areas and audiences.

¹² Field testing would cost thousands of dollars to obtain reliable results, as it is very likely that multiple field tests would be required to adequately ascertain the impact.

In lieu of the ALTV proposal, APTS/PBS reiterate their support for Viacom's previous suggestion¹³ that the Commission create a special window during which only U-to-U licensees assigned DTV channels with lower power levels can request higher power levels. Proponents for increased power levels (that may include proposals for directional antennas and/or other technologies) would retain the burden of proving, based on engineering studies, that they will not cause additional interference. Proposals would be decided by the FCC on a case-by-case basis, with adequate opportunity for all potentially affected parties to object. This would afford low power UHF licensees the opportunity to increase power levels, without placing an unfair burden on potentially affected neighboring stations.¹⁴

In the meantime APTS/PBS urge the Commission to aggressively collect field test data on the impact of DTV operations, particularly on the effect of the power differential between V-to-U and U-to-U stations in the same market. Once the Commission collects adequate field test data, it will be better positioned to evaluate the gravity of the problem and implement workable solutions.

¹³ Viacom Inc.'s Opposition to Petitions for Reconsideration of the Fifth Report and Order and of the Sixth Report and Order to Petitions for Reconsideration (July 18, 1997) (Viacom Opposition), pp. 8-10.

¹⁴ In connection with the Viacom Response to the ExParte Submission of MSTV and ALTV being filed today, APTS/PBS agree that the FCC should take workable measures to close the gap between one megawatt stations and lower power stations to ensure the lower power stations adequate coverage in their communities. However, APTS/PBS cannot support the specific solution proposed by Viacom in its Response without further engineering study.

Conclusion

APTS/PBS urge the Commission to adopt an altered Table that resolves the technical problems raised by MSTV, as well as public television's concerns with the proposed MSTV table. APTS/PBS also urge the Commission to recognize the potential power differential problems by establishing a special window during which only UHF licensees assigned UHF DTV channels can request permission to use higher power levels and directional antennas.

Respectfully submitted,

PUBLIC BROADCASTING
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Attachment A

**Public Television Stations With Both Analog Channel and Proposed MSTV DTV
Assignment Outside Channels 2-51**

Station/Location	NTSC Ch.	FCC DTV Ch.	MSTV DTV Ch.	Licensee Type	Annual Operating Budget
KLCS, Los Angeles CA	58	41	59	Local School District	\$3.2 million
KCSM, San Mateo CA*	60	59	59	University	\$3.5 million
WGBY, Springfield, MA*	57	58	58	Community	\$4.2 million
WFPT, Frederick, MD	62	28	63	State Network	\$30 million ¹
WGVK, Kalamazoo, MI	52	5	67	University	\$5.3 million ²
WEKW, Keene, NH	52	49	67	State Network	\$1.5 million
WCVE, Plattsburgh, NY	57	38	58	University	\$2.2 million
WQLN, Erie, PA	54	50	68	Community	\$2.7 million
WNVC, Fairfax, VA*	56	57	57	Community	\$2.2 million
WMSY, Marion, VA	52	42	53	Community	\$3.2 million ³
WCVW, Richmond, VA	57	44	58	Community	\$5.9 million ⁴

* FCC assignment also outside 2-51 core.

Public Television Stations With MSTV Proposed DTV Assignments Between 60-69

Station/Location	NTSC Ch.	FCC DTV Ch.	MSTV DTV Ch.	Licensee Type	Annual Operating Budget
WKHA, Hazard, KY	35	16	60	State Network	\$19.7 million ⁵
WMVT, Milwaukee, WI	36	35	61	University	\$3.5 million
WEDH, Hartford, CT	24	32	63	State Network	\$20 million ⁶
WFPT, Frederick, MD	62	28	63	State Network	\$30 million ⁷
WNET, Newark, NJ**	13	61	64	Community	\$106.2 million
WGVK, Kalamazoo, MI	52	5	67	University	\$5.3 million ⁸
WEKW, Keene, NH	52	49	67	State Network	\$1.5 million
WLVT, Allentown, PA**	39	62	67	Community	\$3.5 million
WQLN, Erie, PA	54	50	68	Community	\$2.7 million

** FCC assignment also between 60-69.

¹ Entire annual operating budget for Maryland Public Television, including operation of six transmitters.

² Annual operating budget for two public television stations licensed to Grand Valley State University: WGVU, Grand Rapids and WGVK, Kalamazoo.

³ Annual operating budget for three public television stations licensed to Blue Ridge Public Television, Inc.: WBRA, Roanoke, VA, WMSY, Marion, VA, and WBSN, Norton, VA.

⁴ Annual operating budget for two public television stations, WCVE and WCVW, Richmond, VA.

⁵ Entire annual operating budget of Kentucky Educational Television, including operation of 16 transmitters.

⁶ Entire annual operating budget of Connecticut Public Broadcasting, including operation of four transmitters.

⁷ Entire annual operating budget for Maryland Public Television, including operation of six transmitters.

⁸ Annual operating budget for two public television stations licensed to Grand Valley State University: WGVU, Grand Rapids and WGVK, Kalamazoo.

Attachment B

**Some Public Television Station Technical Problems With the Proposed
MSTV Table**

1. WITF, Harrisburg, PA

NTSC: 33

FCC: 36 (99%)*

MSTV: 4 (97.8%)

- With a DTV channel 4, WITF would be the only VHF assignment in an otherwise all UHF market. This would require viewers to install a second outside antenna (according to Longley-Rice). A channel 4 antenna is large and cumbersome and an unlikely attachment to most viewer's rooftops. The costs to viewers would place WITF in jeopardy of lost viewership, underwriting and public support.

- As shown by ATTC, interference from impulse noise on lower VHF channels would threaten WITF's ability to reach its viewers on the fringes of its coverage area.

- A DTV equipment vendor has proposed to make WITF the beta test site to test a mid-powered UHF DTV signal (channel 36) for the state of Pennsylvania. As a beta test site, WITF could become a DTV pioneer and early service provider. A channel 4 DTV assignment would eliminate that opportunity.

- Ch. 4 is outside the 7-51 core spectrum and would require WITF to move back into the core at the end of the transition.

2. WNYE, New York, NY

NTSC: 25

FCC: 24 (98.5%)

MSTV: 26 (74.9%)

- While WNYE's FCC assignment would replicate 98.5 percent of its current coverage, WNYE's MSTV assignment would replicate only 74.9 percent. The loss of 25 percent of its coverage area severely threatens WNYE's ability to bear the substantial costs of converting to digital.

- Under the MSTV scenario, the only way to increase coverage replication to an acceptable level on channel 26 would be to increase power or tower height, costly modifications for a station with an operating budget of only \$1.6 million.

* Percentage of NTSC coverage match given by the corresponding table of allotments.

3. WNPE, Watertown, NY

NTSC: 16

FCC: 41 (100%)

MSTV: 17 (99.7%)

WNPI, Norwood, NY

NTSC: 18

FCC: 23 (100%)

MSTV: 55 (100%)

- WNPE/WNPI is licensed to St. Lawrence Valley Educational Television Council in Watertown, NY. WNPE serves Watertown and operates WNPI, which serves Norwood, NY. Both WNPE and WNPI are small rural market stations serving border communities close to Lake Ontario with a joint annual operating budget under \$3 million.
- WNPE's existing towers cannot be re-stressed to support two transmission lines and two broadcast antennas. With its FCC assignments, WNPE had a basic plan to combine their NTSC and DTV channels into a common transmission line. This plan would avoid the cost of a new tower, another transmission line and a new DTV antenna. WNPE operates WNPI, so the costs or savings could be doubled.
- WNPE's current transmission line would accommodate the combined power of the 2 channels, but channel 16 requires transmission line to be in lengths of 19.75 ft in length (which ours is currently), and channel 17 requires transmission line lengths of 19.5 ft in lengths. Channel 17 passing through a channel 16 length line would cause a high VSWR. The same transmission line mismatch also exists for WNPI in the MSTV table.
- In the case of WNPI, MSTV channel 55 lies outside of the core and would require a second move at the end of the transition period. A double move would impose a terrible financial burden on WNPI.

4. WEAO, Akron, OH

NTSC: 49

FCC: 32 (87.8%)

MSTV: 50 (99%)

- WEAO's tower if fully loaded and, according to a 1995 tower strength analysis, will not support the additional windloading of a second antenna and transmission line. To convert to digital the station believes it must use a common NTSC/DTV antenna and transmission line. Based on current engineering analysis, upper adjacent DTV channels will be most difficult, if not impossible, using a common NTSC/DTV antenna and transmission line.

- WEAO's tower is at maximum FAA height. If a common NTSC/DTV antenna and transmission line is not used, WEAO will have no option but to remove a section of the tower in order to handle the separate NTSC and DTV antennae. WEAO will have to force other stations (including two public radio stations) and agencies (including public safety organizations) who lease space on the tower to relocate to another facility. This will cause a substantial revenue loss to WEAO. From a practical standpoint, there is no tower in the Akron area to which these tenants can relocate.

- WEAO believes it will not be possible to secure zoning approval to construct a 1000 ft. tower in Akron. Even if zoning approval were not a consideration, the cost of an additional tower alone would be significant and might seriously impair WEAO's ability to convert to digital.

- Channels 49 and 50 are potentially outside of the core spectrum, so WEAO could face a costly double move at the end of the transition.

5. WPSX, University Park, PA

NTSC: 3

FCC: 15 (97.3%)

MSTV: 49 (93.8%)

- WPSX's reportable audience is located at the edges of its current NTSC Grade B coverage. Both DTV assignments would compromise this coverage and increase power requirements and operating costs, the MSTV assignment more so.

- UHF does not provide good signal penetration in the valleys and mountainous terrain of central Pennsylvania.

6. WVIA, Scranton, PA

NTSC: 44

FCC: 41 (99.2%)

MSTV: 5 (99.8%)

- Not only does the MSTV Table assign WVIA a channel that is potentially out of the core, it allots WVIA 1 kW on ch. 5 to replicate 99.8 percent of its current coverage area. Based on its own analysis, WVIA does not believe that 1 kW will be sufficient to replicate 99.8 percent of its current coverage.

7. WMVT, Milwaukee, WI

NTSC: 36

FCC: 35 (70.1%)

MSTV: 61 (100%)

- WMVT was assigned DTV channel 35 by the FCC and channel 61 by the MSTV. While the MSTV suggested changes appear to improve coverage for WMVT (from 70.1 percent in the FCC table to 100 percent) through reduced DTV interference, it would create additional hardships in both present and future costs, NTSC/DTV interference from the new power assigned to Channel 35, and loss of adjacent channel control.
- In its table the FCC assigned adjacent channels to common owners (24/25 & 35/36) to allow inter-transmitter oscillator locking and power control to minimize interference. With the FCC' scheme in mind, to maximize efficiency, WMVS/WMVT has made plans for the conversion to DTV based on emerging combined channel transmitter technology which would combine NTSC 36 and DTV 35 using a single transmitter.
- WMVS & WMVT are currently collocated with WVTV, Ch 18, and plan to build a new tower 340 feet SE of the existing structure. This new tower will be a candelabra designed to support the nine (9) DTVs assigned to Milwaukee in the FCC Table in an effort to eliminate some non-collocation interference issues.
- DTV channel 61 would force costly double move for WMVT and its licensee the Milwaukee Area Technical College Board.

8. WNED, Buffalo, NY

NTSC: 17

FCC: 43 (99.6%)

MSTV: 14 (98.8%)

- Channel 14 is adjacent to the land mobile service and could require costly filtering measures to protect land mobile, as required by the FCC.
- The MSTV table decreases by WNED's power by nearly half from the FCC Table to 81 kW. WNED is concerned that this decrease of power could seriously disadvantage it within its own market and in its relation to the Canadian DTV channel assignments.

9. WHRO, Norfolk, VA

NTSC: 15 (99.6%)

FCC: 16 (

DTV: 14 (99.6%)

- According to WHRO's engineer, sufficient data does not exist that demonstrates the level of interference to channel 14 from the land mobile and airport frequencies.